

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JACKSON LEWIS LLP
ATTORNEYS FOR DEFENDANT MSLGROUP Americas, Inc.
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ATTORNEYS OF RECORD:
VICTORIA WOODIN CHAVEY, ESQ.
JEFFREY W. BRECHER, ESQ.

-----X	
MONIQUE DA SILVA MOORE, MARYELLEN O'DONOHUE, LAURIE MAYERS, HEATHER PIERCE, and KATHERINE WILKINSON, on behalf of themselves and all others similarly situated,	
Plaintiffs,	Case No. 11-cv-1279 (ALC) (AJP)
vs.	
PUBLICIS GROUPE SA and MSLGROUP,	
Defendants.	
-----X	

**DECLARATION OF VICTORIA WOODIN CHAVEY
IN SUPPORT OF DEFENDANT MSLGROUP AMERICAS, INC.'S OPPOSITION TO
PLAINTIFFS' MOTION FOR CONDITIONAL CERTIFICATION**

I, Victoria Woodin Chavey, Esq., an attorney admitted to practice law, inter alia, before the United States District Court for the Southern District of New York, hereby affirm, under penalty of perjury, as follows:

1. I am a member of the law firm Jackson Lewis LLP, counsel for Defendant MSLGROUP Americas, Inc.

2. The following statements are true based upon my own knowledge, review of pertinent documents, and information and belief.

3. Attached as Exhibit 1 is a true and correct copy of MSL00822, regarding the various job titles held by MSL's Public Relations employees (Confidential).

4. Attached as Exhibit 2 are true and correct copies of MSL001134-35, 1136-1137, 1138-39, 1148-1149, and 1150-51, regarding job descriptions for the following positions: North American Practice Director; Managing Director, PCPR NY and Account Director, Sanof-Aventis; Practice Director; Senior Vice President Deputy Managing Director; and Vice President.

5. Attached as Exhibit 3 is a true and correct copy of the March 16, 2012 Declaration of Stephanie Smith.

6. Attached as Exhibit 4 is a true and correct copy of the Declaration of Amanda Glasgow.

7. Attached as Exhibit 5 is a true and correct copy of the March 16, 2012 Declaration of Vickie Fite.

8. Attached as Exhibit 6 is a true and correct copy of MSL 004950-4970, regarding 2009/2010 Salary Band Data (Confidential).

9. Attached as Exhibit 7 is a true and correct copy of relevant portions of Plaintiff da Silva Moore's Deposition transcript.

10. Attached as Exhibit 8 is a true and correct copy of relevant portions of Plaintiff Perlman's deposition transcript.

11. Attached as Exhibit 9 is a true and correct copy of Pltfs_000667-670 regarding Plaintiff Perlman's biography.

12. Attached as Exhibit 10 is a true and correct copy of relevant portions of Plaintiff Mayer's deposition transcript.

13. Attached as Exhibit 11 is a true and correct copy of relevant portions of Plaintiff Pierce's deposition transcript.

14. Attached as Exhibit 12 is a true and correct copy of a January 27, 2009 Email from Jim Tsokanos, Defendant's Exhibit 87 from Plaintiff O'Donohue's deposition.

15. Attached as Exhibit 13 is a true and correct copy of the Expert Report of Dr. John H. Johnson, IV.

16. Attached as Exhibit 14 is a true and correct copy of a summary of salary data produced in discovery in this case (Confidential).

17. Attached as Exhibit 15 are true and correct copies of examples of organizational charts regarding Defendant MSL (Confidential).

18. Attached as Exhibit 16 is a true and correct copy of relevant portions of Dr. Janice Madden's deposition transcript.

Affirmed on this 19th day
of March 2012.

/s/
VICTORIA WOODIN CHAVEY, ESQ.

CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2012, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and/or the Southern District's Rules on Electronic Service upon all counsel of record.

/s/
VICTORIA WOODIN CHAVEY

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